

March 20, 2008

BY FACSIMILE

The Honorable Sidney H. Stein United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007

MEMO ENDORSED

Re:

United States v. Lucero Gomez & Juan Carlos Naut,

08 Cr. 32 (SHS)

Dear Judge Stein:

The Government writes (with the consent of defense counsel) to respectfully request an extension of time in which it may produce discovery, and a 30-day adjournment of the conference scheduled for March 21, 2008 in the above-referenced case. The discovery in the case is more extensive than original anticipated, and the Government has needed additional time to make its production. The Government will provide the initial discovery this week, but will need an additional two weeks to provide the discovery materials relating to Title III wiretaps conducted in Massachusetts. Because of the Government's delay, defense council is presently unable to inform the Court of their intentions with respect to any motions they may wish to make, and therefore they join in this request for an adjournment of the conference date.

Should the Court grant the adjournment request, the Government further respectfully requests that the Court exclude the time under the Speedy Trial Act until the new conference date. In the interim, the Government will provide defense counsel with copies of the

SO ORDERED 3/24/08

SIDNEY M. STEIN

U.S.D.J.

discovery, defense counsel will review the discovery with their respective clients, and the parties will continue discussions regarding a possible disposition of this case.

> Respectfully submitted, MICHAEL J. GARCIA United States Attorney

By: Parvin Moyne

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Mitchell Dinnerstein, Esq. (by facsimile) cc: Martin L. Schmukler, Esq. (by facsimile)

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